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WILLIAMS, MIKE WOOD, LARRY  
WOODS, MARVIN WOODSON,

**PLAINTIFFS,**

V.

NATIONAL FOOTBALL LEAGUE, and NFL  
PROPERTIES LLC,

**DEFENDANTS.**

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### **INTRODUCTION**

1. This action is brought to seek declaratory relief and damages related to the Defendants' tortious misconduct and voluntary undertaking with regard to the health effects of repeated head impacts, and the injuries consequently suffered by the Plaintiffs who are former National Football League ("NFL" or "League") players. The injuries include sequelae of the concussions and repeated head impacts suffered by the Plaintiffs during their play in the NFL, including traumatic brain injuries and latent neurodegenerative disorders and diseases. The allegations herein, except as to the Plaintiffs themselves, are based on information and belief.

### **JURISDICTION AND VENUE**

2. Jurisdiction is based on 28 U.S.C. § 1332(a)(1), and (b); and 28 U.S.C. § 1332(d)(11). All of the Plaintiffs and all of the Defendants are citizens of different states. The amount in controversy exceeds \$75,000.00, exclusive of interest and costs, for each Plaintiff. The amount in controversy for all Plaintiffs in this mass action exceeds \$5,000,000.00, exclusive of interest and costs. This matter can be tried jointly in that the Plaintiffs' claims involve common questions of law or fact.

3. This Court has personal jurisdiction over the Defendants because they have substantial and continuous business contacts in the Commonwealth of Pennsylvania.

4. Venue is proper pursuant to 28 U.S.C. § 1391(a)(2), and 28 U.S.C. § 1391(b)(2), as a substantial part of the events and omissions giving rise to the claims occurred in this judicial district.

### **THE PARTIES**

5. Plaintiff Brent Boyd ("Boyd") is 54 years old and he resides with his wife in Reno, Nevada. He was an NFL offensive guard who played with the Minnesota Vikings

(1980-86). He has been diagnosed with Chronic Traumatic Encephalopathy ("CTE"). Boyd was one of a handful of former NFL players who testified before the Judiciary Subcommittee of the United States House of Representatives on June 26, 2007, concerning concussions in the NFL. He founded the NFL retired player advocacy group Dignity After Football. Boyd suffered repeated and chronic head impacts during his career in the NFL and as a result, has experienced cognitive difficulties including, but not limited to CTE, headaches, dizziness, loss of memory, suicidal thoughts, fatigue, depression, temporary blindness, and vertigo.

6. Plaintiff Margene Adkins ("Adkins") is 64 years old and resides with his wife in Fort Worth, Texas. He was an NFL wide receiver for the Dallas Cowboys (1970-71), the New Orleans Saints (1972), and the New York Jets (1973). Adkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Adkins has experienced cognitive difficulties including, but not limited to headaches, dizziness, and loss of memory.

7. Plaintiff Fred Anderson ("Anderson") is 56 years old and resides with his wife in Kirkland, Washington. He was an NFL defensive end for the Pittsburgh Steelers (1978-79), and the Seattle Seahawks (1980-82). Anderson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Anderson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

8. Plaintiff Charles Anthony ("Anthony") is 59 years old and resides in Fremont, California. He was an NFL line backer for the San Diego Chargers (1974). Anthony suffered repeated and chronic head impacts during his career in the NFL and is at an increased

risk of latent brain disease. As a result, Anthony has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

9. Plaintiff Lionel Antoine ("Antoine") is 61 years old and resides in Biloxi, Mississippi. He was an NFL offensive tackle for the Chicago Bears (1972-78). Antoine suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Antoine has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

10. Plaintiff Harvey Armstrong ("Armstrong") is 51 years old and resides in Norcross, Georgia. He was an NFL nose tackle who played for the Philadelphia Eagles (1982-84), and the Indianapolis Colts (1986-90). Armstrong suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Armstrong has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

11. Plaintiff Mike Augustyniak ("Augustyniak") is 55 years old and resides in St. Johns, Florida. He was an NFL running back who played for the New Orleans Saints (1980), and the New York Jets (1981-84). Augustyniak suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Augustyniak has experienced cognitive difficulties including, but not limited to headaches,

dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

12. Plaintiff Jeff Barnes ("Barnes") is 56 years old and resides with his wife in Stockton, California. He was an NFL linebacker who played for the Oakland/Los Angeles Raiders (1977-87). Barnes was a member of the Raiders' Super Bowl XV and XVIII Championship teams. Barnes suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Barnes has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

13. Plaintiff Lemuel Barney ("Barney") is 66 years old and resides with his wife in Michigan. He was an NFL defensive back who played with the Detroit Lions (1967-77). He was voted NFL Defensive Rookie of the Year in 1967 and was selected to the NFL's 1960s All Decade Team. He was a seven-time Pro Bowl selection (1967-69, 1972-73, 1975-76) and was a seven-time All Pro selection (1967-70, 1972-73, 1975). He was elected to the Pro Football Hall of Fame in 1992. In 1999, Barney was included in the Sporting News's list of the 100 greatest football players. Barney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Barney has experienced cognitive difficulties including, but not limited to headaches, dizziness, irritability, sleep problems, neck and cervical arthritis and associated numbness/tingling.

14. Plaintiff Thomas Beer ("Beer") is 67 years old and resides in Pine Brook, New Jersey. He was an NFL tight end who played for the Denver Broncos (1967-68), and the Boston/New England Patriots (1971-72). Beer suffered repeated and chronic head impacts

during his career in the NFL and is at an increased risk of latent brain disease. As a result, Beer has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, and neck and cervical arthritis.

15. Plaintiff Robert Bell ("Bell") is 63 years old and resides with his wife in North Wales, Pennsylvania. He was an NFL defensive tackle for the Detroit Lions (1971-73), and the St. Louis Cardinals (1974-78). Bell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Bell has experienced cognitive difficulties including, but not limited to headaches, dizziness, and loss of memory.

16. Plaintiff Melvin Carver ("Carver") is 52 years old and resides with his wife in Tampa, Florida. He was an NFL running back for the Tampa Bay Buccaneers (1982-85), and the Indianapolis Colts (1987). Carver suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Carver has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck/cervical spine arthritis and associated numbness and tingling.

17. Plaintiff Reginald Clark ("Clark") is 44 years old and resides with his wife in North Carolina. He was an NFL linebacker who played for the Pittsburgh Steelers (1994), and the Jacksonville Jaguars (1995-96). Clark suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Clark has experienced cognitive difficulties including, but not limited to headaches, dizziness, blurry vision, ringing in ears, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.



18. Plaintiff William "Bill" Cody ("Cody") is 67 years old and resides in Fairhope, Alabama. He was an NFL linebacker who played for the Detroit Lions (1966), the New Orleans Saints (1967-70), and the Philadelphia Eagles (1972). Cody suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cody has experienced cognitive difficulties.

19. Plaintiff Mark Cooper ("Cooper") is 51 years old and resides in Aurora, Colorado. He was an NFL offensive tackle who played for the Denver Broncos (1983-87), and the Tampa Bay Buccaneers (1987-89). Cooper suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cooper has experienced cognitive difficulties including, but not limited to sleep problems, and neck and cervical numbness/tingling.

20. Plaintiff Mark Cotney ("Cotney") is 59 years old and resides with his wife in Lutz, Florida. He was an NFL defensive back who played for the Houston Oilers (1975), and the Tampa Bay Buccaneers (1976-84). Cotney was selected by the Tampa Bay Buccaneers in the 1976 Expansion Draft and was a member of the original winless 1976 Buccaneers team. Cotney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cotney has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

21. Plaintiff Neal Craig ("Craig") is 63 years old and resides in Ohio. He was an NFL defensive back for the Cincinnati Bengals (1971-73), the Buffalo Bills (1974), and the Cleveland Browns (1975-76). Craig suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Craig has

experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, and numbness/tingling in neck and cervical spine.

22. Plaintiff Peter Cronan ("Cronan") is 56 years old. He was an NFL linebacker for the Seattle Seahawks (1977-81), and the Washington Redskins (1981-85). Cronan was a member of the Washington Redskins Super Bowl XVII Championship team. Cronan suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Cronan has experienced cognitive difficulties including, but not limited to headaches, lightheadedness, and dizziness.

23. Plaintiff Craig Curry ("Curry") is 50 years old and resides in Houston, Texas. He was an NFL defensive back for the Tampa Bay Buccaneers (1984-86), and the Indianapolis Colts (1987). Curry suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Curry has experienced cognitive difficulties.

24. Plaintiff Michael "Tony" Davis ("Davis") is 58 years old and resides in Greeley, Colorado. He was an NFL running back for the Cincinnati Bengals (1976-78), and the Tampa Bay Buccaneers (1979-81). In 1977, Davis was voted team MVP by the Bengals. Davis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Davis has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

25. Plaintiff Joseph DeLamielleure ("DeLamielleure") is 60 years old and resides with his wife in Charlotte, North Carolina. He was an NFL offensive guard who played for the Buffalo Bills (1973-79, 1985) and the Cleveland Browns (1980-84). He was selected to

be included in the Wall of Fame for both teams. He was voted Co-Offensive Lineman of the Year in 1973 and the NFLPA/AFC Offensive Lineman of the Year in 1975. In 1977, he received the Forrest Gregg Award as the NFL Offensive Lineman of the Year. He was selected six times to the Pro Bowl (1975-80) and as All Pro (1975-80). DeLamielleure was elected to the Pro Football Hall of Fame in 2003. DeLamielleure suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, DeLamielleure has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, sleep problems, irritability, 60% hearing loss in left ear, neck and cervical spine arthritis and associated numbness/tingling.

26. Plaintiff Conrad Dobler ("Dobler") is 61 years old and resides in Overland Park, Kansas. He was an NFL offensive guard for the St. Louis Cardinals (1972-77), New Orleans Saints (1978-79), and Buffalo Bills (1980-81). He was a six-time Pro Bowl selection (1975-77). Dobler is 90% disabled today, having had nine knee replacement surgeries alone. Dobler suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Dobler has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

27. Plaintiff Kenneth Easley, Jr. ("Easley") is 52 years old and resides in Norfolk, Virginia. He was an NFL defensive back who played for the Seattle Seahawks (1981-87). He was a five-time Pro Bowl selection, four-time All-Pro, was the 1984 NFL Defensive Player of the Year, and a member of the NFL's 1980s All-Decade Team. Easley suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of

latent brain disease. As a result, Easley has experienced cognitive difficulties including, but not limited to dizziness, loss of memory, sleep problems, and numbness/tingling in neck and cervical spine.

28. Plaintiff Ken Fantetti ("Fantetti") is 54 years old. He was an NFL linebacker who played for the Detroit Lions (1979-85). Fantetti suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Fantetti has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

29. Plaintiff Lee Folkins ("Folkins") is 72 years old and resides with his wife in Orlando, Florida. He was an NFL tight end who played for the Green Bay Packer (1961), the Dallas Cowboys (1962-64), and the Pittsburgh Steelers (1965). He was selected to play in the 1963 Pro Bowl. Folkins suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Folkins has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, irritability, and neck and cervical spine numbness/tingling.

30. Plaintiff Fred Forsberg ("Forsberg") is 67 years old and resides in Sammamish, Washington. He was an NFL linebacker who played for the Denver Broncos (1968-73), the Buffalo Bills (1973), and the San Diego Chargers (1974). Forsberg suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Forsberg has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neck and cervical arthritis and associated numbness/tingling.

31. Plaintiff Phillip Freeman, III ("Freeman") is 49 years old and resides in Tampa, Florida. He was an NFL wide receiver and kick returner for the Tampa Bay Buccaneers (1985-87). Freeman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Freeman has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory.

32. Plaintiff Joe Ferguson, Jr. ("Ferguson") is 61 years old and resides in Bella Vista, Arizona. He was an NFL quarterback for the Buffalo Bills (1973-1984), the Tampa Bay Buccaneers (1988-89), and the Indianapolis Colts (1990). In 1993, Ferguson was inducted into the Buffalo Bills Wall of Fame and his number 12 Jersey was retired in honor of both Ferguson and fellow quarterback Jim Kelly. Ferguson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ferguson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, and irritability.

33. Plaintiff Derrick Gaffney ("Gaffney") is 56 years old and resides in Jacksonville, Florida. He was an NFL wide receiver for the New York Jets (1978-87). Gaffney suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gaffney has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling, blurred vision, and ringing in ears.

34. Plaintiff James Garcia ("Garcia") is 67 years old and resides in San Antonio, Texas. He was an NFL defensive end who played for the Cleveland Browns (1965), the New York Giants (1966), the New Orleans Saints (1967), and the Atlanta Falcons (1968).

Garcia suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Garcia has experienced cognitive difficulties.

35. Plaintiff Donnie Green ("D. Green") is 63 years old and resides in Hagerstown, Maryland. He was an NFL tackle who played for the Buffalo Bills (1971-76), the Philadelphia (1977), and the Detroit Lions (1978). D. Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, D. Green has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, and numbness/tingling in neck and cervical spine.

36. Plaintiff Willie Green ("Green") is 45 years old and resides with his wife in North Carolina. He was an NFL wide receiver who played for the Detroit Lions (1991-93), the Tampa Bay Buccaneers (1994), the Carolina Panthers (1995-96), and the Denver Broncos (1997-98). Green suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Green has experienced cognitive difficulties including, but not limited to headaches, loss of memory, depression, and sleep problems.

37. Plaintiff Alfred Gross ("Gross") is 50 years old and resides in Phoenix, Arizona. He was an NFL defensive back for the Cleveland Browns (1983-87). Gross suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Gross has experienced cognitive difficulties including, but not limited to headaches, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

39. Plaintiff Cedrick Hardman (“Hardman”) is 63 years old and resides in Laguna Beach, California. He was an NFL defensive end who played for the San Francisco 49ers (1970-79), and the Oakland Raiders (1980-81). He is the current all-time sack leader for the San Francisco 49ers franchise, and was a two-time Pro Bowl selection in 1971 and 1975. Hardman was a member of the Raiders’ Super Bowl XV Championship team. Hardman suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hardman has experienced cognitive difficulties including, but not limited to loss of memory, neck and cervical arthritis and associated numbness/tingling.

41. Plaintiff Charley Harraway (“Harraway”) is 67 years old and resides with his wife in Sarasota, Florida. He was an NFL running back who played for the Cleveland Browns (1966-68), and the Washington Redskins (1969-73). In 1966, Harraway was selected by teams in both the AFL and NFL drafts. Harraway suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result,



Harraway has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

42. Plaintiff James Harrell ("Harrell") is 54 years old and resides in Florida. He was an NFL linebacker for the Detroit Lions (1979-86), and the Kansas City Chiefs (1987). Harrell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harrell has experienced cognitive difficulties including, but not limited to headaches, dizziness, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

43. Plaintiff Cliff Harris ("Harris") is 62 years old and resides in Rockwall, Texas. He was an NFL defensive back who played for the Dallas Cowboys (1970-79). He was a six-time Pro Bowl selection (1974-79) and was a four-time All-Pro selection (1975-78). He was voted as a member of the NFL's 1970s All-Decade Team, played in five Super Bowls and is a member of the Dallas Cowboys' prestigious Ring of Honor. In 2004 Harris was a finalist for the Pro Football Hall of Fame. Harris suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Harris has experienced cognitive difficulties.

44. Plaintiff Victor Hicks ("Hicks") is 54 years old and resides in Carrollton, Texas. He was an NFL tight end who played for the Los Angeles Rams (1980). Hicks suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hicks has experienced cognitive difficulties.

45. Plaintiff Don Horn ("Horn") is 66 years old and resides in Colorado Springs, Colorado. He was an NFL quarterback who played for the Green Bay Packers (1967-



70), the Denver Broncos (1971-72), and the Cleveland Browns (1973-74). Horn suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Horn has experienced cognitive difficulties including, but not limited to dizziness, impulse control problems, depression, fatigue, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

46. Plaintiff James Hough ("Hough") is 55 years old and resides with his wife in Chaska, Minnesota. He was an NFL offensive guard who played for the Minnesota Vikings (1978-86). Hough suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Hough has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neurological disorder fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

47. Plaintiff Delles Howell ("Howell") is 63 years old and resides with his wife in Monroe, Louisiana. He was an NFL defensive back who played for the New Orleans Saints (1970-72), and the New York Jets (1973-75). Howell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Howell has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

48. Plaintiff Brad Jackson ("Jackson") is 36 years old and resides in Pikesville, Maryland. He was an NFL linebacker who played for the Miami Dolphins (1998), the Baltimore Ravens (1998-01), and the Carolina Panthers (2002). Jackson was a member of the Ravens' Super Bowl XXXV Championship team. Jackson suffered repeated and chronic

head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jackson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

49. Plaintiff Calvin Jackson ("C. Jackson") is 39 years old and resides in Pompano, Florida. He was an NFL defensive back who played for the Miami Dolphins (1994-99). C. Jackson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, C. Jackson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine numbness/tingling.

50. Plaintiff J. Bruce Jarvis ("Jarvis") is 62 years old and resides in Sammamish, Washington. He was an NFL center who played for the Buffalo Bills (1971-74). Jarvis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jarvis has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

51. Plaintiff Leon "Ray" Jarvis ("R. Jarvis") is 62 years old and resides with his wife in Brookfield, Wisconsin. He was an NFL wide receiver who played for the Atlanta Falcons (1971-72), the Buffalo Bills (1973), the Detroit Lions (1974-78), and the New England Patriots (1979). R. Jarvis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, R. Jarvis has experienced

cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

52. Plaintiff Noel Jenke ("Jenke") is 64 years old and resides in Brookfield, Wisconsin. He was an NFL linebacker for the Minnesota Vikings (1971), the Atlanta Falcons (1972), and the Green Bay Packers (1974). Jenke suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jenke has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, and stroke (2008).

53. Plaintiff Olrick Johnson, Jr. ("Johnson") is 34 years old and resides in Miami, Florida. He was an NFL linebacker who played for the New York Jets (1999), the Minnesota Vikings (1999), and the New England Patriots (2000). Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Johnson has experienced cognitive difficulties including, but not limited to seizures, epilepsy, headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

54. Plaintiff Troy Johnson ("T. Johnson") is 49 years old and resides in Chauvin, Louisiana. He was an NFL wide receiver who played for the St. Louis Cardinals (1986-87), the Pittsburgh Steelers (1988), the Detroit Lions (1989), and the San Diego Chargers (1990). T. Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, T. Johnson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control

problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

55. Plaintiff Trumaine Johnson ("Tru. Johnson") is 51 years old and resides with his wife in Baton Rouge, Louisiana. He was an NFL wide receiver who played for the San Diego Chargers (1985-86), and the Buffalo Bills (1987-89). Tru. Johnson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Tru. Johnson has experienced cognitive difficulties including, but not limited to headaches, dizziness, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

56. Plaintiff Aaron Jones II ("Jones") is 44 years old and resides with his wife in Orlando, Florida. He was an NFL defensive end for the Pittsburgh Steelers (1988-92), the New England Patriots (1993-95), and the Miami Dolphins (1996). Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jones has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

57. Plaintiff James Jones ("J. Jones") is 50 years old and resides in Tampa, Florida. He was an NFL fullback who played for the Detroit Lions (1983-88, 93), and the Seattle Seahawks (1989-92). Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Jones has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

58. Plaintiff Steve Jones ("S. Jones") is 60 years old and resides in St. Louis, Missouri. He was an NFL running back who played for the Buffalo Bills (1973-74), and the St. Louis Cardinals (1974-78). S. Jones suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, S. Jones has experienced cognitive difficulties including, but not limited to dizziness, loss of memory, fatigue, sleep problems, irritability, neck and cervical spine numbness/tingling.

59. Plaintiff Joseph Kapp ("Kapp") is 73 years old and resides with his wife in Los Gatos, California. He was an NFL quarterback who played for the Minnesota Vikings (1967-69), and the Boston Patriots (1970). Kapp was selected to the 1969 Pro Bowl. In September 1969, Kapp set an NFL record by throwing 7 touchdown passes in a single game. Kapp led the Vikings to Super Bowl IV, where they lost to the Kansas City Chiefs. Kapp suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kapp has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, neurological disorder, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

60. Plaintiff Mark Koncar ("Koncar") is 58 years old and resides with his wife in Alpine, Utah. He was an NFL offensive tackle who played for the Green Bay Packers (1976-81), and the Houston Oilers (1982-83). Koncar suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Koncar has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck and cervical spine arthritis.

61. Plaintiff Mervin Krakau ("Krakau") is 60 years old and resides in Guthrie Center, Iowa. He was an NFL linebacker who played for the Buffalo Bills (1973-78), and the New England Patriots (1978). Krakau suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krakau has experienced cognitive difficulties.

62. Plaintiff Paul Krause ("Krause") is 69 years old and resides with his wife in Minnesota. He was an NFL defensive back for the Washington Redskins (1964-67), and the Minnesota Vikings (1968-79). He was an eight-time selection to the Pro Bowl (1964-65, 69, 71-75), was an eight-time All-Pro selection (1964-65, 68-73, 75), holds the NFL record for career interceptions (81), and was a member of four Super Bowl teams (IV, VIII, IX, XI). He was voted into the Pro Football Hall of Fame in 1998. Krause suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krause has experienced cognitive difficulties.

63. Plaintiff Robert "Bob" Kroll ("Kroll") is 61 years old and resides in Longwood, Florida. He was an NFL defensive back who played for the Green Bay Packers (1972). Kroll suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Kroll has experienced cognitive difficulties.

64. Plaintiff Charles Krueger ("Krueger") is 74 years old and resides in Clayton, California. He was an NFL defensive tackle who played for the San Francisco 49ers (1959-73). He was a two-time Pro Bowl selection, and three-time All-Pro. Krueger suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Krueger has experienced cognitive difficulties.

65. Plaintiff Bruce Laird ("Laird") is 61 years old and resides with his wife in Towson, Maryland. He was an NFL defensive back who played for the Baltimore Colts (1972-81), and the San Diego Chargers (1982-83). Laird was selected to the Pro Bowl in 1972, and was voted All-Pro that same year. Laird suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Laird has experienced cognitive difficulties including, but not limited to headaches, loss of memory, depression, sleep problems, and neck and cervical numbness/tingling.

66. Plaintiff MacArthur Lane ("Lane") is 69 years old and resides in Oakland, California. He was an NFL running back who played for the St. Louis Cardinals (1968-71), the Green Bay Packers (1972-74), and the Kansas City Chiefs (1975-78). Lane was selected to the 1970 Pro Bowl. Lane suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lane has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

67. Plaintiff Gene Lang ("Lang") is 49 years old and with his wife resides in Denver, Colorado. He was an NFL running back who played for the Denver Broncos (1984-87), and the Atlanta Falcons (1988-90). Lang suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lang has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, numbness, and tingling in neck and cervical spine.



68. Plaintiff Peter Lazetich ("Lazetich") is 61 years old and resides in Reno, Nevada. He was an NFL defensive end who played for the San Diego Chargers (1972-75), and the Philadelphia Eagles (1976-78). Lazetich suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Lazetich has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling

69. Plaintiff Estate of Gregory Lens ("Lens") is deceased and was a resident of West, Texas. He was an NFL defensive tackle who played for the Atlanta Falcons (1970-72). Lens suffered repeated and chronic head impacts during his career in the NFL and suffered latent brain disease. Prior to his death, Lens experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, CTE, Alzheimer's, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, and irritability.

70. Plaintiff Donald Macek ("Macek") is 57 years old and resides in Escondido, California. He was an NFL center who played for the San Diego Chargers (1976-89). In 2004 Macek was voted into the San Diego Chargers' Hall of Fame and is a member of the 50 Greatest Chargers team. Macek suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Macek has experienced cognitive difficulties including, but not limited to headaches, loss of memory, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

71. Plaintiff Donald Manoukian ("Manoukian") is 77 years old and resides in Reno, Nevada. He was an NFL offensive guard who played for the Oakland Raiders (1960). Manoukian suffered repeated and chronic head impacts during his career in the NFL and is at an



increased risk of latent brain disease. As a result, Manoukian has experienced cognitive difficulties including, but not limited to headaches, dizziness, vertigo, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

72. Plaintiff Rod Martin ("Martin") is 57 years old and resides in Manhattan Beach, California. He was an NFL linebacker for the Oakland/L.A. Raiders (1977-88). Martin was a member of the Raiders' Super Bowl XV and XVIII Championship teams, and holds the Super Bowl record for interceptions in one game with three. He was a two-time selection to the Pro Bowl (1983-84), and was a two-time All-Pro selection (1982-84). Martin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Martin has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, irritability numbness/tingling in neck and cervical spine.

73. Plaintiff Ira Matthews III ("Matthews") is 54 years old and resides in Missouri City, Texas. He was an NFL running back who played for the Oakland Raiders (1979-81). Matthews was named All-Pro in 1979, set a Monday Night Football record with a 104 yard kick-off return for a touchdown (October 25, 1979), and was a member of the Raiders' Super Bowl XV Championship team. Matthews suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Matthews has experienced cognitive difficulties.

74. Leonard "Bubba" McDowell, Jr. ("McDowell") is 44 years old and resides in Richmond, Texas. He was an NFL safety who played for the Houston Oilers (1989-94), and the Carolina Panthers (1995). McDowell suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McDowell has

experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, sleep problems, neck and cervical arthritis and associated numbness/tingling.

75. Plaintiff Jeff McIntyre ("McIntyre") is 56 years old and resides in Phoenix, Arizona. He was an NFL linebacker who played for the Denver Broncos (1979), the San Francisco 49ers (1980), and the St. Louis Cardinals (1981-82). McIntyre suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McIntyre has experienced cognitive difficulties including, but not limited to loss of memory, depression, fatigue, sleep problems, neck and cervical spine arthritis and associated numbness/tingling.

76. Plaintiff Dennis McKnight ("McKnight") is 52 years old and resides in San Diego, California. He was an NFL offensive guard who played for the San Diego Chargers (1982-89), the Detroit Lions (1990-92), and the Philadelphia Eagles (1991). McKnight suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, McKnight has experienced cognitive difficulties including, but not limited to headaches, loss of memory, depression, suicidal thoughts, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

77. Plaintiff Jon Melander ("Melander") is 44 years old and resides in Victoria, Minnesota. He was an NFL offensive guard who played for the New England Patriots (1991), the Cincinnati Bengals (1992) and the Denver Broncos (1993-94). Melander suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Melander has experienced cognitive difficulties including, but not limited to loss of memory, depression, fatigue, irritability, neck and cervical arthritis and associated numbness/tingling.

78. Plaintiff Michael Merriweather ("Merriweather") is 50 years old and resides in Stockton, California. He was an NFL linebacker for the Pittsburgh Steelers (1982-87), the Minnesota Vikings (1989-92), the New York Jets (1993), and the Green Bay Packers (1993). He is a three-time Pro Bowl selection (1984-86), and a three-time All-Pro Selection (1984-85, 87). Merriweather suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Merriweather has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

79. Plaintiff Terrance "Terry" Metcalf ("Metcalf") is 60 years old and resides in Seattle, Washington. He was an NFL running back who played for the St. Louis Cardinals (1973-77), and the Washington Redskins (1981). Metcalf was selected to 3 Pro Bowls (1974, 1975, and 1977), and was an All-Pro selection in 1975. Metcalf hold the NFL record for number of games with 250+ all purpose yards, with 7. Metcalf suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Metcalf has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

80. Plaintiff Caleb Miller ("Miller") is 31 years old and resides in Florence, Kentucky. He was an NFL middle linebacker who played for the Cincinnati Bengals (2004-07). Miller suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Miller has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems,

depression, suicidal thoughts fatigue, sleep problems, irritability, numbness and tingling in neck and tingling.

81. Plaintiff Kory Minor ("Minor") is 34 years old and resides in Moreno Valley, California. He was an NFL linebacker who played for the Carolina Panthers (1999-2002). Minor suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Minor has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

82. Plaintiff Derland Moore ("Moore") is 60 years old and resides in Mandeville, Louisiana. He was an NFL defensive tackle for the New Orleans Saints (1973-1985), and the New York Jets (1986). He was selected to play in the 1983 Pro Bowl, set a Saints team record for service with 169 games played, and is a member of the New Orleans Saints Hall of Fame. Moore suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Moore has experienced cognitive difficulties.

83. Plaintiff Michael Morton ("Morton") is 51 years old and resides in Wesley Chapel, Florida. He was an NFL running back who played for the Tampa Bay Buccaneers (1982-84), the Washington Redskins (1985), and the Seattle Seahawks (1987). Morton suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Morton has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, fatigue, irritability, and numbness/tingling in neck and cervical spine.

84. Plaintiff Charles Myrtle ("Myrtle") is 66 years old and resides in Bethesda, Maryland. He was an NFL running back who played for the Denver Broncos (1967-72), and the San Diego Chargers (1974). Myrtle suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Myrtle has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neurological disorder, depression, irritability, double vision, neck and cervical arthritis and associated numbness/tingling.

85. Plaintiff Mark Nichols ("Nichols") is 52 years old and resides in Bakersfield, California. He was an NFL wide receiver who played for the Detroit Lions (1981-89). Nichols suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nichols has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, Alzheimer's, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

86. Plaintiff Tommy Nobis ("Nobis") is 68 years old and resides with his wife in Atlanta, Georgia. He was an NFL linebacker who played for the Atlanta Falcons (1966-76). He was the first ever player drafted by the expansion Falcons in 1966 and was voted NFL Defensive Rookie of the Year. He was a five-time Pro Bowl selection (1966-70, 1972), was selected All-Pro (1967), and was voted to the NFL's 1960s All-Decade Team. Nobis suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nobis has experienced cognitive difficulties including, but not limited to headaches, loss of memory, dementia, depression, fatigue, sleep problems, numbness/tingling in neck and cervical spine.

87. Plaintiff Keith Nord ("Nord") is 54 years old and resides in Minnesota. He was an NFL defensive back who played for the Minnesota Vikings (1979-85). Nord suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Nord has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

88. Plaintiff August "Gus" Otto ("Otto") is 68 years old and resides in Chesterfield, Missouri. He was an NFL linebacker who played for the Oakland Raiders (1965-72). Otto was a member of the Raiders' first Super Bowl team (Super Bowl II), which they lost to the Green Bay Packers. Otto suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Otto has experienced cognitive difficulties including, but not limited to headaches, dizziness, and loss of memory.

89. Plaintiff Terry Owens ("Owens") is 67 years old and resides with his wife in Decatur, Alabama. He was an NFL offensive tackle who played for the San Diego Chargers (1966-75). Owens suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Owens has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, peripheral neuropathy, neck and cervical arthritis and associated numbness/tingling.

90. Plaintiff Gary Padjen ("Padjen") is 53 years old and resides in Carmel, Indiana. He was an NFL linebacker who played for the Baltimore/Indianapolis Colts (1982-87). Padjen suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Padjen has experienced cognitive difficulties

including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

91. Plaintiff Randy Ragon ("Ragon") resides in Lahaina, Hawaii. He was an NFL wide receiver who played for the Buffalo Bills (1978). Ragon suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Ragon has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, suicidal thoughts, fatigue, irritability, neck and cervical spine arthritis and associated numbness/tingling.

92. Plaintiff David Recher ("Recher") is 68 years old and resides in Gilbert, Arizona. He was an NFL center who played for the Philadelphia Eagles (1965-68). Recher suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Recher has experienced cognitive difficulties.

93. Plaintiff Jerry Robinson ("Robinson") is 54 years old and resides in Santa Rosa, California. He was an NFL linebacker who played for the Philadelphia Eagles (1979-84), and the Los Angeles Raiders (1985-92). In 1981 he was selected to the Pro Bowl, and was voted All-Pro. He was also a member of the Eagles Super Bowl XV team. Robinson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Robinson has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, neurological disorder, depression, suicidal thoughts, fatigue, sleep problems, irritability, and numbness/tingling in neck and spine.

94. Plaintiff Rick Sanford ("Sanford") is 54 years old and resides in Irmo, South Carolina. He was an NFL defensive back who played for the New England Patriots



(1979-1984), and the Seattle Seahawks (1985). Sanford suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Sanford has experienced cognitive difficulties including, but not limited to loss of memory, impulse control problems, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

95. Plaintiff William "Billy" Shields ("Shields") is 58 years old and resides in Poway, California. He was an NFL offensive tackle who played for the San Diego Chargers (1975-83), San Francisco 49ers (1984), and the New York Jets (1985). Shields suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Shields has experienced cognitive difficulties.

96. Plaintiff Fred Smerlas ("Smerlas") is 54 years old and resides in Sudbury, Massachusetts. He was an NFL nose tackle who played for the Buffalo Bills (1979-89), the San Francisco 49ers (1990), and the New England Patriots (1991-1992). Smerlas was a five-time Pro Bowl selection (1980-83, and 1988), Smerlas suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Smerlas has experienced cognitive difficulties.

97. Plaintiff Charlie Smith ("Smith") is 65 years old and resides with his wife in Oakland, California. He was an NFL running back who played for the Oakland Raiders (1968-74), and the San Diego Chargers (1974-75). Smith was a member of the Raiders' first Super Bowl team (Super Bowl II) which lost to the Green Bay Packers. Smith suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Smith has experienced cognitive difficulties including, but not limited to



headaches, dizziness, loss of memory, depression, fatigue, sleep problems, and neck and cervical spine numbness/tingling.

98. Plaintiff Arthur Still ("Still") is 56 years old and resides in Liberty, Missouri. He was an NFL defensive end who played for the Kansas City Chiefs (1978-87), and the Buffalo Bills (1988-89). Still suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Still has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, fatigue, sleep problems, irritability, and neck and cervical spine arthritis.

99. Plaintiff Bryan Stoltenberg ("Stoltenberg") is 39 years old and resides in Sugar Land, Texas. He was an NFL center and offensive guard who played for the San Diego Chargers (1996), the New York Giants (1997) and the Carolina Panthers (1998-2000). Stoltenberg suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Stoltenberg has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, and numbness and tingling in neck and cervical spine.

100. Plaintiff William Truax ("Truax") is 68 years old and resides in Gulfport, Mississippi. He was an NFL tight end who played for the Los Angeles Rams (1964-70), and the Dallas Cowboys (1971-73). Truax suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Truax has experienced cognitive difficulties including, but not limited to headaches, dizziness, and neck and cervical spine arthritis and associated numbness/tingling.

101. Plaintiff Clarence Verdin ("Verdin") is 48 years old and resides with his wife in New Orleans, Louisiana. He was an NFL wide receiver who played for the Washington Redskins (1986-87), the Indianapolis Colts (1988-93), and the Atlanta Falcons (1994). Verdin was a two-time Pro-Bowl selection (1990, 1992), and was a member of the Redskins' Super Bowl XXII Championship team. Verdin suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Verdin has experienced cognitive difficulties.

102. Plaintiff Phil Villapiano ("Villapiano") is 62 years old and resides with his wife in Rumson, New Jersey. He was an NFL linebacker who played for the Oakland Raiders (1971-79), and the Buffalo Bills (1980-83). He was a four-time Pro Bowl selection (1973-76), and a Super Bowl Champion with Raiders in Super Bowl XI. Villapiano suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Villapiano has experienced cognitive difficulties including, but not limited to loss of memory, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

103. Plaintiff Jeffrey Walker ("Walker") is 48 years old and resides in Southaven, Mississippi. He was an NFL offensive tackle for the San Diego Chargers (1986), and the New Orleans Saints (1988-89). Walker suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Walker has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, depression, fatigue, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

104. Plaintiff Larry Webster ("Webster") is 42 years old and resides in Baltimore, Maryland. He was an NFL defensive tackle who played for the Miami Dolphins

(1992-94), the Cleveland Browns (1995), the Baltimore Ravens (1996-01), and the New York Jets (2002). Webster was a member of the Ravens' Super Bowl XXXV Champion ship team. Webster suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Webster has experienced cognitive difficulties including, but not limited to headaches, dizziness, depression, fatigue, sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

105. Plaintiff Michael Weddington ("Weddington") is 51 years old and resides with his wife in Simi Valley, California. He was an NFL line backer who played for the Green Bay Packers (1986-90). Weddington suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Weddington has experienced cognitive difficulties including, but not limited sleep problems, irritability, neck and cervical spine arthritis and associated numbness/tingling.

106. Plaintiff Edward White ("White") is 64 years old and resides in Julian, California. He was an NFL offensive guard for the Minnesota Vikings (1969-77) and the San Diego Chargers (1978-85). White was a four-time Pro Bowl selection (1975-77 and 1979), and is one of only 10 players to have played in all four Vikings' Super Bowl appearances. When he retired, no professional football player had played in more games as an offensive lineman (241 games played). White suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, White has experienced cognitive difficulties.

107. Plaintiff James Williams ("Williams") is 43 years old and resides in Duluth, Georgia. He was an NFL linebacker who played for the New Orleans Saints (1990-94), the Jacksonville Jaguars (1995-96), the Atlanta Falcons (1996-97), the San Francisco 49ers

(1997-98), and the Cleveland Browns (1999). Williams was selected by the Jacksonville Jaguars in the 1995 Expansion Draft. Williams suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Williams has experienced cognitive difficulties including, but not limited to headaches, dizziness, loss of memory, dementia, impulse control problems, neurological disorder, depression, suicidal thoughts, sleep problems, irritability, neck and cervical arthritis and associated numbness/tingling.

108. Plaintiff Mike Wood ("Wood") is 57 years old and resides in Missouri. He was an NFL kicker who played for the Minnesota Vikings (1978), the St. Louis Cardinals (1978-80), and the Baltimore Colts (1981-82). Wood suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Wood has experienced cognitive difficulties.

109. Plaintiff Larry Woods ("Woods") is 63 years old and resides in Houston, Texas. He was an NFL defensive tackle who played for the Detroit Lions (1971-72), the Miami Dolphins (1973), the New York Jets (1974-75), and the Seattle Seahawks (1976). Woods suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Woods has experienced cognitive difficulties.

110. Plaintiff Marvin Woodson ("Woodson") is 70 years old and resides with his wife in Dallas, Texas. He was an NFL defensive back who played for the Pittsburgh Steelers (1964-69), and the New Orleans Saints (1969). Woodson suffered repeated and chronic head impacts during his career in the NFL and is at an increased risk of latent brain disease. As a result, Woodson has experienced cognitive difficulties including, but not limited to headaches,

dizziness, loss of memory, impulse control problems, depression, suicidal thoughts, sleep problems, irritability, and numbness/tingling in neck and cervical spine.

111. Defendant NFL, which maintains its offices at 280 Park Avenue, New York, New York, is an unincorporated association consisting of the 32 separately-owned and independently-operated professional football teams that are listed below. The NFL is engaged in interstate commerce in the business of, among other things, operating the sole major professional football league in the United States. The NFL is not, and has not, been the employer of the Plaintiffs, all of whom were employed during their respective careers in professional football by the clubs indicated above. The United States Supreme Court held last year in *American Needle, Inc. v. NFL*, 130 S.Ct. 2201, 2212-13 (2010) that each team that is a member of the NFL association is a legally distinct and separate entity from both other teams and the League itself:

The NFL teams do not possess either the unitary decisionmaking quality or the single aggregation of economic power characteristic of independent action. Each of the teams is a substantial, independently owned, and independently managed business. “[T]heir general corporate actions are guided or determined” by “separate corporate consciousnesses,” and “[t]heir objectives are” not “common.” . . . The teams compete with one another, not only on the playing field, but to attract fans, for gate receipts and for contracts with managerial and playing personnel.

112. The 32 separately-owned and independently-operated professional football teams mentioned above are:

NFL Team Owner	State of Organization	Team Name (City)
Arizona Cardinals, Inc.	Arizona	Arizona Cardinals
Atlanta Falcons Football Club LLC	Georgia	Atlanta Falcons
Baltimore Ravens Limited Partnership	Maryland	Baltimore Ravens

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San Francisco Forty Niners Ltd.	California	San Francisco 49ers
Football Northwest LLC	Washington	Seattle Seahawks
The Rams Football Company LLC	Delaware	St. Louis Rams
Buccaneers Limited Partnership	Delaware	Tampa Bay Buccaneers
Tennessee Football, Inc.	Delaware	Tennessee Titans
Washington Football Inc.	Maryland	Washington Redskins

113. Defendant NFL Properties, LLC as the successor-in-interest to National Football League Properties Inc. ("NFL Properties") is a limited liability company organized and existing under the laws of the State of Delaware with its headquarters in the State of New York. NFL Properties is engaged in, among other activities, approving, licensing and promoting equipment used by all the National Football League teams. NFL Properties regularly conducts business in California.

114. Defendants National Football League and NFL Properties shall be referred to collectively herein as the “NFL” or “League.”

115. The NFL caused or contributed to the injuries alleged herein through its voluntary undertaking including its acts and omissions in misrepresenting the true risks of repeated traumatic brain and head impacts in NFL football, and failing to take appropriate steps to prevent and mitigate repeated traumatic brain and head impacts in the NFL and the latent neurodegenerative disorders and diseases caused by these impacts.

116. Third parties that conspired with the NFL in the tortious conduct alleged herein include but are not limited to the member NFL clubs identified herein and Riddell Inc., d.b.a. Riddell Sports Group, Inc., All American Sports Corp. d.b.a. Riddell/All American,



Riddell Sports Group, Inc., Easton-Bell Sports, Inc., and Easton-Bell Sports LLC, EB Sports Corp.

**MASS ACTION AND JOINDER ALLEGATIONS**

117. Joinder is permissible pursuant to Fed. R. Civ. P. 20(a) in that the claims alleged herein arise out of the same series of occurrences, and questions of law or fact common to all Plaintiffs arise in this action.

118. Common questions of law and fact will arise in this action, including but not limited to:

- a. Whether the NFL, through its own voluntary undertaking, was negligent in its response to the health effects of repeated head impacts and the injuries consequently suffered by the Plaintiffs;
- b. Whether § 301 of the Labor Relations Management Act preempts Plaintiffs' tort law claims pled herein;
- c. Whether the NFL committed negligence and/or fraud in misrepresenting the risks of repeated head impacts in NFL play to the Plaintiffs; and
- d. Whether repeated head impacts during play in the NFL cause latent neurodegenerative brain disorders and disease.

**NATURE OF NFL'S BUSINESS**

119. The primary business in which the NFL and its member clubs are engaged is the operation of major league professional football teams and the sale of tickets and telecast rights to the public for the exhibition of the individual and collective football talents of players such as Plaintiffs.



The NFL is like Procter & Gamble. There's the holding company, the core operation, but then each brand has its own team and world of revenue. Like Tide: That's a P&G product but within that there are different types of Tide and a number of people that make money from it. So the \$9.3 billion pie just scratches the surface and doesn't get into how much is spent around stadiums, merchandise, agents, all the way down to mom-and-pop shops.

122. Companies pour money into the league's coffers for the right to associate their brands with the NFL. Among those making such contributions are Pepsi (\$560 million over eight years, starting in 2004) and Gatorade (\$45 million a year, plus marketing costs and free Gatorade for teams). Verizon is paying \$720 million over four years to be the league's wireless service provider. Nike paid \$1.1 billion to acquire the NFL's apparel sponsorship. Previous partner Reebok had been selling \$350 million annually in NFL-themed gear. The League has a \$1.2 billion, six-year deal with beer sponsor Anheuser-Busch, but teams still cut their own deals when it comes to pouring rights at stadiums. On September 7, 2011, it was announced that the NFL signed a new 10-year \$2.3 billion deal with Pepsi, which is one of the largest sponsorship

124. Many clubs that are part of the NFL association own in whole or in part the stadiums in which they play, which can be a source of major commercial value, as reflected in the following chart:

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Qwest Field, SEA	2002	\$422M	29
Invesco Field, DEN	2001	\$683M	39
Heinz Field, PIT	2001	\$312M	16

125. In 2010, more than 17 million fans passed through turnstiles operated by clubs that are part of the NFL association, paying anywhere from \$54.51 (Cleveland Browns) to \$117.84 (New England Patriots) for the average game ticket. Though the league won't open its books, numbers for the publicly-held Green Bay Packers ("Packers") offer some insight into what teams reap at the ticket office and concession stands. In 2010, the Packers cleared \$60,059,646 from home and away game tickets plus private boxes. Projected over 32 teams, that's nearly \$2 billion annually. The Packers reaped \$13 million from concessions, parking and local media in 2010, which translates to \$416 million on a league-wide basis.

## FACTUAL ALLEGATIONS

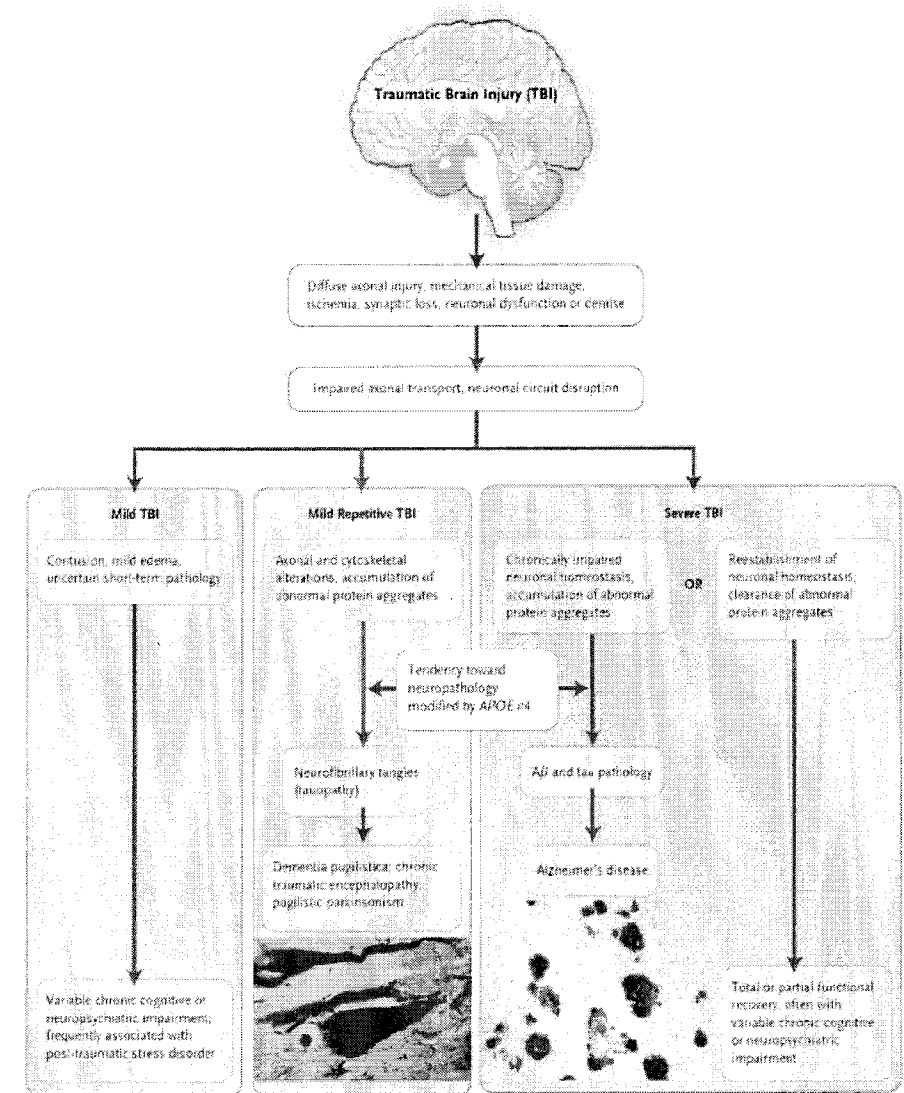
**A. The Scientific Evidence On Concussions And Head Injuries And The NFL's Responses To It.**

126. A 2011 article in the Journal of Sports & Entertainment Law of Harvard Law School has summed up the consequences of concussions to athletes (footnotes omitted):

From high school leagues to the NFL, football players are becoming bigger, faster, and stronger, thereby increasing the force of collisions that occur during a game and increasing the potential for serious injuries. The brain is a soft organ, surrounded by cerebrospinal fluid and protected by the tough, bony skull. Normally, the fluid around the brain serves as a protective cushion for the brain, isolating it from direct impact to the skull. When the head suffers violent impact, the brain can hit the skull, causing the brain temporarily to stop working normally. This is called a concussion.

More serious injuries occur after the initial concussion. A concussion causes brain cells to become depolarized and allows neurotransmitters to behave in an abnormal fashion, causing such symptoms as memory loss, nausea, and confusion. After the initial concussion, when the brain is not fully healed, it is very fragile and susceptible to minor accelerative forces. Thus, subsequent minor hits may cause traumatic and permanent brain injury. This is the heart of the problem: players returning to the football field before allowing their initial concussion to heal fully. When the player returns to the field too early, he is at risk for what is known as Second Impact Syndrome (SIS). SIS is the event that ensues when there is a subsequent brain impact before the initial concussion has been given time to heal. Additionally, when concussions occur with high frequency, a disease called Chronic Traumatic Encephalopathy (CTE) may occur in the brain. "CTE is a progressive neurodegenerative disease caused by repetitive trauma to the brain which eventually leads to dementia." While CTE was originally diagnosed most commonly in boxers, it is now regularly found in football players. **Of all sports related injuries, concussions are the injuries that most often go unnoticed and untreated, especially in football.** (Emphases added).

127. The following chart, excerpted from a 2010 article in the *New England Journal of Medicine* entitled "Traumatic Brain Injury--Football, Warfare And Long-Term Effects" shows how even repetitive mild traumas can have lasting consequences:



**Spectrum of Pathologic Features and Outcomes of Traumatic Brain Injury (TBI).**

In the left inset, Bielschowsky silver stain shows intraneuronal and extracellular neurofibrillary tangles in temporal cortex from a retired boxer with dementia pugilistica.<sup>1</sup> The right inset shows diffuse Aβ plaque deposits in temporal cortex from a subject who sustained severe TBI.<sup>2</sup>

128. The NFL's responses to the issue of brain injuries caused to retired NFL players because of concussions or head impacts received during the period that they played professional football has been, until very recently, one of deception and denial. The NFL and several of the scientists it employed actively tried to conceal the extent of the problem until recently. The response of the League once it acknowledged the issue has been inadequate.

129. The League's disinformation campaign was spearheaded by its Mild Traumatic Brain Injury Committee ("MTBI Committee", sometimes also referred to in press reports as the "Concussion Committee"), which was created by the NFL's own initiative and voluntary undertaking in 1994, and chaired from 1994 to February of 2007 by Dr. Elliott Pellman ("Pellman"), a rheumatologist who reportedly attended medical school in Guadalajara, Mexico. Dr. Pellman worked with two other scientists on the MTBI Committee—Dr. Ira Casson ("Casson"), a neurologist, and Dr. David Viano ("Viano"), a biomechanical engineer—to attempt to discredit a slew of scientific studies that linked head impacts and concussions received by NFL players to brain injuries. Casson and Viano replaced Pellman as co-chairs of the MTBI Committee in February of 2007.

130. Since 1994, the MTBI Committee had been conducting a study to determine the effect of concussions on the long-term health of retired NFL players. In a November 2007 report to Congress, NFL Commissioner Roger Goodell ("Goodell") said that the MTBI Committee's study was in its "initial" data collection phase and that "[w]e do not know when this study will be completed, although it is likely that a comprehensive study will require at least several years of research and analysis."

131. In October of 2006, Pellman and Viano published in *Neurological Focus* an interim report on the MTBI Committee's efforts that surveyed 12 years of data collection. The authors analyzed collected "data on mild TBIs sustained between 1996 and 2001" and concluded that:

**[B]ecause a significant percentage of players returned to play in the same game [as they suffered a mild traumatic brain injury] and the overwhelming majority of players with concussions were kept out of football-related activities for less than 1 week, it can**

**be concluded that mild TBIs in professional football are not serious injuries.** (Emphases added).

132. As explained further below, this conclusion was against the weight of the scientific evidence, a fact that the members of the MTBI Committee well knew; it was also based on biased data collection techniques. As ESPN reported in February of 2007:

**Last fall, ESPN The Magazine reported that Pellman was selective in his use of injury reports in reaching his conclusions and omitted large numbers of players from the league's concussion study. His findings also contradicted other scientific studies into the effects of concussions:**

**• In January 2005, Pellman and his colleagues wrote that returning to play after a concussion "does not involve significant risk of a second injury either in the same game or during the season." But a 2003 NCAA study of 2,905 college football players found just the opposite: Those who have suffered concussions are more susceptible to further head trauma for seven to 10 days after the injury.**

**• Pellman, a rheumatologist, and his group have also stated repeatedly that their work shows "no evidence of worsening injury or chronic cumulative effects of multiple [mild traumatic brain injury] in NFL players." But a 2003 report by the Center for the Study of Retired Athletes at the University of North Carolina found a link between multiple concussions and depression among former pro players with histories of concussions. And a 2005 follow-up study at the Center showed a connection between concussions and both brain impairment and Alzheimer's disease among retired NFL players.** (Emphases added).

133. The concerns about head injuries associated with the playing of football—and the refusal to recognize those concerns by those in charge of the game—have a long history. On Monday, February 1st, 2010, Dr. Bennet Omalu ("Omalu"), Co-Director of the Brain Injury



Institute at West Virginia University, spoke before members of the House Judiciary Committee at a forum in Houston, Texas with regard to "Head and Other Injuries in Youth, High School, College, and Professional Football." In his prepared testimony, he explained:

Glenn Pop Warner [1871 – 1954] founded the Pop Warner youth football league in 1929. He still remains one of the greatest football coaches in the history of American football. The single event, which necessitated the use of pads and helmets by football players took place in 1888 when the annual rules convention for the emerging sport of college football passed a rule permitting tackling below the waist.

"Football changed dramatically. Teams no longer arrayed themselves across the entire breadth of the field. Teams bunched themselves around the runner to block for him. The wedge and mass play arrived. Football became, for a time, a savage sport full of fights, brawling, even fatalities."

**In 1912, Pop Warner said: "Playing without helmets gives players more confidence, saves their heads from many hard jolts, and keeps their ears from becoming torn or sore. I do not encourage their use. I have never seen an accident to the head which was serious, but I have many times seen cases when hard bumps on the head so dazed the player receiving them that he lost his memory for a time and had to be removed from the game."**

We have known about concussions and the effects of concussions in football for over a century. Every blow to the head is dangerous. Repeated concussions and sub-concussions both have the capacity to cause permanent brain damage. During practice and during games, a single player can sustain close to one thousand or more hits to the head in only one season without any documented or reported incapacitating concussion. Such repeated blows over several years, no doubt, can result in permanent impairment of brain functioning especially in a child. (Footnotes omitted; emphases added).

134. The scientific evidence on concussions and subsequent brain disease in boxing, football, and other sports has been mounting, but for a long period, the NFL attempted to deny, discredit, and ignore it.

135. The risk of repeated head impacts in certain sports and brain disease has been understood for decades. In 1928, a New Jersey pathologist, Harrison Martland, described the clinical spectrum of abnormalities found in "nearly one half of the fighters who stayed in the game long enough." Follow-up studies on encephalopathy and repeated head impacts in sport were published in 1952. The risk of second impacts (Second Impact Syndrome) in sport was identified in 1973. It was also clear by the 1970's that the patterns of neurodegeneration associated with head impacts in boxing also occurred in other sports.

136. From 1931 to 2006, the National Center for Catastrophic Sport Injury Research has reported 1,006 direct and 683 indirect fatalities resulting from participation in all organized football in the United States; the annual number of indirect fatalities has remained near 9.0 per year.

137. A 1994 Ball State University survey found that "players in the 1980s suffered serious injuries and underwent operations at twice the rate of those who played in the 1950s or earlier."

138. A study presented at the American Academy of Neurology's 52nd Annual Meeting in 2000 and authored principally by Dr. Barry Jordan, Director of the Brain Injury Program at Burke Rehabilitation Hospital in White Plains, New York, surveyed 1,094 former NFL players between the ages of 27 and 86 and found that: (a) more than 61 % had suffered at least one concussion in their careers with 30 % of the players having three or more and 15 % having five or more; (b) 51% had been knocked unconscious more than once; (c) 73 % of those

injured said they were not required to sit on the sidelines after their head trauma; (d) 49 % of the former players had numbness or tingling; 28 % had neck or cervical spine arthritis; 31 % had difficulty with memory; 16 % were unable to dress themselves; and 11 % were unable to feed themselves; and (e) eight suffered from Alzheimer's disease.

139. A 2001 report by Dr. Frederick Mueller that was published in the Journal of Athlete Training reported that a football-related fatality has occurred every year from 1945 through 1999, except for 1990. Head-related deaths accounted for 69 % of football fatalities, cervical spinal injuries for 16.3 %, and other injuries for 14.7 %. High school football produced the greatest number of football head-related deaths. From 1984 through 1999, 69 football head-related injuries resulted in permanent disability.

140. A series of important studies emanated from the University of North Carolina ("UNC") that were attacked by members of the NFL's MTBI Committee.

141. A 2000 UNC study found that in the period between 1977 and 1998, an annual average of 13 athletes had suffered catastrophic injuries (primarily permanent paralysis) as the direct result of participation in football. The study also found that between 1977 and 1998, 200 football players received a permanent cervical cord injury, and 66 sustained a permanent cerebral injury." As reported in *Science Daily*:

The study, published in the September-October issue of the American Journal of Sports Medicine, suggests that the brain is more susceptible to injury when it has not had enough time to recover from a first injury. Researchers say the finding is important because concussions can lead to permanent brain damage, vision impairment or even death if not managed properly.

**"We believe recurrences are more likely because injured players are returning to practice and to games too quickly after blows to the head," said Dr. Kevin M. Guskiewicz, assistant professor of exercise**